

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
BEAUFORT DIVISION

ELIZABETH FRAZIER, )  
Plaintiff, ) Civil Action No. 9:21-cv-00135-DCN  
vs. )  
DOLGENCORP, LLC D/B/A DOLLAR )  
GENERAL, D/B/A DOLLAR GENERAL )  
STORE NO. 09450, MICHAEL ZACZEK )  
AND CANDY BERMEJO, )  
Defendants. )

---

**NOTICE OF REMOVAL**

TO: WARREN R. LOKEY, ESQUIRE AND J. LOGAN HOLMES, ESQUIRE, ATTORNEY  
FOR PLAINTIFF:

YOU WILL PLEASE TAKE NOTICE that the Defendant, Dolgencorp, LLC D/B/A  
Dollar General, D/B/A Dollar General Store No. 09450, removes the above-captioned case from  
the Circuit Court of Jasper County, South Carolina, into the United States District Court, District  
of South Carolina, Charleston Division. This removal is proper on the following grounds:

1. A civil action has been commenced and is now pending in the Circuit Court of  
Jasper County, State of South Carolina, styled *Elizabeth Frazier vs. Dolgencorp, LLC d/b/a*

*Dollar General, d/b/a Dollar General Store No. 09450, Michael Zaczek and Candy Bermejo*,  
Civil Action Number 2020-CP-27-00644.

2. This action is one in which the United States District Courts have original  
jurisdiction, because the action involves a controversy which is wholly between citizens and/or  
entities of different states, in that upon information and belief, the Plaintiffs were at the time of  
the commencement of this action, and still are, citizens of the State of South Carolina. The

Defendants were at the time incorporated with its principal place of business in a State other than South Carolina or reside in a State other than South Carolina.

3. The Defendant is entitled to removal of the aforesaid action to this Court because complete diversity of citizenship exists between the Plaintiffs and the Defendants and the amount in the controversy exceeds the jurisdictional amount required by 28 U.S.C. § 1332.

4. This action was commenced by service of the Summons and Complaint, attached hereto as Exhibit A, effectuated by Certified Mail on December 14, 2020. Pursuant to 28 U.S.C. § 1446, this Notice of Removal is filed within thirty (30) days of service upon the Defendant of the initial pleadings setting forth the claim upon which relief is requested. This Defendant will serve an Answer or responsive pleading as provided by law.

5. The The Honorable Margaret Bostick, Clerk of Court of Jasper County, has been provided a copy of this Notice of Removal.

WHEREFORE, this Defendant gives notice that the aforesaid action is removed from the Circuit Court of Jasper County, State of South Carolina, and to this Court for trial and determination.

MCANGUS GOUDELOCK & COURIE, L.L.C.

s/R. Trippett Boineau, III

R. TRIPPETT BOINEAU, III (Fed Bar No. 09936)  
trippett.boineau@mgclaw.com  
ADRIAN D. DUKES (Fed Bar No. 11875)  
adrian.dukes@mgclaw.com  
Post Office Box 12519  
1320 Main Street, 10th Floor (29201)  
Columbia, South Carolina 29211  
Telephone: (803) 779-2300  
Facsimile: (803) 748-0526  
ATTORNEY FOR DEFENDANT  
DOLGENCORP, LLC

Columbia, South Carolina  
January 13, 2021